

U.S. DISTRICT COURT  
DISTRICT OF VERMONT  
FILED

UNITED STATES DISTRICT COURT  
FOR THE  
DISTRICT OF VERMONT

2023 MAY 25 PM 3:03

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UNITED STATES OF AMERICA )  
 ) NO. 2:23-cr-54-1-2-3  
 v. )  
 )  
 PRADIP SAU, DEBALINA SEN, and ) (18 U.S.C. § 1349)  
 NASIR HUSSAIN )

**INDICTMENT**

The Grand Jury charges:

COUNT 1

From at least in or about May 2019 to on or about May 15, 2023, in the District of Vermont and elsewhere, the defendants PRADIP SAU, DEBALINA SEN, and NASIR HUSSAIN, and others known and unknown to the Grand Jury, knowingly and willfully conspired to commit wire fraud, that is to devise a scheme and artifice to defraud and to obtain money and property by means of false and fraudulent pretenses, representations and promises, and to transmit and cause to be transmitted by interstate wire writings, signs and signals for the purpose of executing the scheme.

(18 U.S.C. § 1349)

A TRUE BILL

FOREPERSON

*Nikolas P. KEREST by EAPC*

NIKOLAS P. KEREST (EAPC)

United States Attorney

Burlington, Vermont

May 25, 2023